

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-CV-957-SDJ

**DECLARATION OF CHRISTOPHER ERICKSON IN SUPPORT OF  
DEFENDANT'S MOTION TO TRANSFER VENUE**

I, Christopher Erickson, declare as follows:

1. I am an attorney in the law firm Axinn, Veltrop & Harkrider LLP, counsel to Defendant Google LLC (“Google”) in the above-captioned litigation.

2. I provide this declaration in support of Google’s motion to transfer venue. This declaration is based on my personal knowledge and investigation.

3. This declaration describes the four-step process that I used to compile a list of ZIP codes within the Eastern District of Texas and the Northern District of California (the “Relevant Districts”).

4. First, I obtained a list of the counties that comprise the Eastern District of Texas from U.S. Marshals Service,<sup>1</sup> which I confirmed matched the list in 28 U.S.C. § 124(c) and a list of the counties that comprise the Northern District of California from its website,<sup>2</sup> which I confirmed matched the list in 28 U.S.C. § 84(a).

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<sup>1</sup> See <https://www.usmarshals.gov/district/tx-e/general/area.htm> (last accessed Feb. 7, 2021).

<sup>2</sup> See <https://www.cand.uscourts.gov/about/northern-district-history/> (last accessed Feb. 7, 2021).

5. Second, I obtained the FIPS codes associated with each county in the Relevant Districts from the list published by the U.S. Department of Agriculture.<sup>3</sup> I then confirmed that those FIPS codes matched a similar list published by the U.S. Census Bureau.<sup>4</sup>

6. Third, I created a list of the ZIP codes associated with the FIPS codes identified in the second step (the “ZIP Code List”) by consulting the 4<sup>th</sup> Quarter 2020 ZIP-COUNTY crosswalk file published by the U.S. Department of Housing and Urban Development.<sup>5</sup> My understanding is that the latter crosswalk file associates a ZIP code with a county if any portion of that ZIP code is within a given county.

7. Fourth, I divided the ZIP Code List into one list of ZIP codes associated with the Northern District of California and a second list of ZIP codes associated with the Eastern District of Texas. I provided those lists to Google employees so that they could use them to compile information about the publishers and advertisers in those districts.

8. I have reviewed Exhibits A1 and A2 to the Second Declaration of Andrew Rope in Support of Defendant’s Motion to Transfer Venue and confirmed that the ZIP codes listed on those exhibits are identical to those described in the preceding paragraph.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9<sup>th</sup> day of February, 2021 in New York, NY.

  
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Christopher Erickson

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<sup>3</sup> See [https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/home/?cid=nrcs143\\_013697](https://www.nrcs.usda.gov/wps/portal/nrcs/detail/national/home/?cid=nrcs143_013697) (last accessed Feb. 7, 2021)

<sup>4</sup> See <https://www.census.gov/geographies/reference-files/2018/demo/popest/2018-fips.html> (last accessed Feb. 7, 2021).

<sup>5</sup> See [https://www.huduser.gov/portal/datasets/usps\\_crosswalk.html](https://www.huduser.gov/portal/datasets/usps_crosswalk.html) (last accessed Feb. 7, 2021).